

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

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**NEW HEIGHTS FARM I, LLC, et al.,**

**Plaintiffs,**

**v.**

**GREAT AMERICAN  
INSURANCE COMPANY, et al.,**

**Defendants.**

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**Case No. 1:23-CV-663**

**Honorable Hala Y. Jarbou  
Magistrate Judge Phillip J. Green**

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**DEFENDANT GREAT AMERICAN INSURANCE COMPANY'S  
CERTIFICATE OF COMPLIANCE WITH WORD LIMITATION**

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1. Great American Insurance Company's Reply Brief to Plaintiffs' Brief in Opposition to Motion to Dismiss complies with the word number limitation contained in W.D. Mich. LCivR 7.2(c) because the number of words in that document, excluding the parts of the document exempted by W.D. Mich. LCivR 7.2(b)(i) is 4,226, which is less than the 4,330 maximum word count permitted in W.D. Mich. LCivR 7.2(c).

2. The word count contained herein was generated using Microsoft® Word for Microsoft 365 MSO (Version 2309 Build 16.0.16827.20130) 64-bit.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he served a copy of the foregoing through the Court's Electronic Case Filing System (CM/ECF), upon Plaintiffs' attorneys, Ronald J. VanderVeen, John D. Fitzpatrick, and Cal Thorwall, Cunningham Dalman, PC, 321 Sellers Road, Holland, MI 49422-1767, this 5th day of October 2023.

s/ Thomas C. James, Jr.

Thomas C. James, Jr.